

SUPERIOR COURT OF N.J.

FILED

FEB 25 2003

**DONALD F. PHELAN
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ472-03-3

Superior Court

Docket Number **03-02-00032-S**

STATE OF NEW JERSEY)

v.)

INDICTMENT

MOHAMMED MUNIR)

and)

GUJRAT TRADING CORP.,
doing business as
CHAMPION CLEANERS)

The Grand Jurors of and for the State of New Jersey, upon their
oaths, present that:

COUNT ONE

(Causing the Abandonment of Hazardous Waste
and Toxic Pollutants - Third Degree)

MOHAMMED MUNIR

and

GUJRAT TRADING CORP., doing business as CHAMPION CLEANERS
on or about December 16, 2002, at the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, recklessly did cause the unlawful abandonment of hazardous
waste and toxic pollutants, that is, the said MOHAMMED MUNIR and
GUJRAT TRADING CORP., doing business as CHAMPION CLEANERS,
recklessly did cause the unlawful abandonment of drums, containers

and other receptacles containing hazardous waste as defined in N.J.S.A. 13:1E-38, specifically spent tetrachloroethylene, also known as perchloroethylene, a listed hazardous waste under 40 CFR sec. 261.31, and listed toxic pollutant under 40 CFR sec. 401.15, on Madison Street, Paterson, New Jersey, between Market Street and Morton Street, contrary to the provisions of N.J.S.A. 2C:17-2a(2), N.J.S.A. 2C:2-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

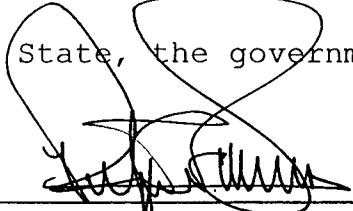
(Causing Transportation of Hazardous Waste
to an Unauthorized Place - Fourth Degree)

MOHAMMED MUNIR

and

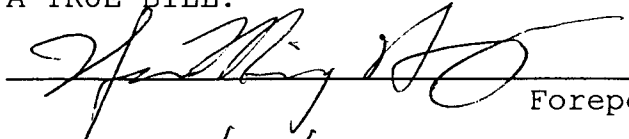
GUJRAT TRADING CORP., doing business as CHAMPION CLEANERS
on or about December 16, 2002, in the City of Paterson, in the
County of Passaic, elsewhere, and within the jurisdiction of this
Court, did recklessly generate and cause or permit hazardous waste
to be transported to a place which did not have authorization from
the New Jersey Department of Environmental Protection to accept such
waste, that is, the said MOHAMMED MUNIR and GUJRAT TRADING CORP.,
doing business as CHAMPION CLEANERS, did recklessly generate and
cause or permit hazardous waste, specifically spent
tetrachloroethylene, also known as perchloroethylene, a listed
hazardous waste under 40 CFR sec. 261.31, to be transported to
Madison Street, Paterson, New Jersey, between Market Street and
Morton Street, a place not authorized to accept such waste by the
New Jersey Department of Environmental Protection, contrary to the

provisions of N.J.S.A. 13:1E-9h(2), N.J.S.A. 2C:2-7 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Peter C. Harvey, F.A.A.G.
Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 2/25/2003